

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
UNITED STATES OF AMERICA )

v. )

CHARLES J. WALLACE )

Defendant. )  
\_\_\_\_\_)

CRIMINAL NO.05-cr-10020 RCL

UNITED STATES MOTION FOR DOWNWARD DEPARTURE

Pursuant to U.S.S.G. §5K1.1, and in accordance with the parties' plea agreement, the United States, by its undersigned counsel, hereby moves for a downward departure.

As grounds for this motion, the United States states that defendant Charles Wallace has provided substantial assistance in the investigation and prosecution of another person who has committed an offense.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

Dated: July 28, 2006

By: /s/ Paul G. Levenson

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non registered participants on this date.

Dated: July 28, 2006

/s/ Paul G. Levenson

PAUL G. LEVENSON